

Privacy Policy

Last updated March 22, 2023

1. Introduction

First and foremost, your privacy is important to us. We are committed to protecting your privacy. This privacy policy explains how we use, process and share the personal data we collect in connection with our website, mobile app and other software. It also tells you your rights regarding your personal data and how to contact us. This privacy policy applies to all forms of customer information we collect through any channel.

2. Definitions

Below is a list of definitions of words used in this privacy policy.

Account:	An account created on Colecti.com.
Anonymous data:	Data as defined in Article 3.
COL:	A utility token from the platform of Colecti
Colecti:	Colecti B.V.
User(s):	Parties with an Account on the Platform Colecti.com, or parties participating in the Tokensale.
Personal Data:	Data as defined in Article 3.
Platform:	the environment at www.colecti.com where Products can be created and traded.
Products:	all (digital) items offered by users through Colecti, including but not limited to NFTs.
Terms and Conditions:	The Terms and Conditions as accessed at http://colecti.com/tokensaleterms
Wallet	Digital wallet held with an external party.

3. Types of data we collect

Personal data means data where someone can identify you individually, such as your name, email address and other non-public information that relates to your person. Anonymous data is data that by itself does not allow identification of individual persons. We collect Personal Data and Anonymous Data in the following manner:

- a. Information you provide to us:
 - I. When you use our Platform, update your Account or contact us, we may collect Personal Data from you, such as email address, first and last name, username and other information you provide. We also collect your blockchain address, which may be linked to Personal Data when you use our Service.
 - II. In your Account, you can save preferences such as how your content is displayed, notification settings and favorites. We may link these choices, if you wish, to your ID, browser or mobile device.
 - III. When you give us feedback or contact us, we collect your name and contact information, as well as any other content included in the message.
 - IV. We may also collect Personal Data in other areas of our Platform where you voluntarily provide it or where we state that Personal Data is being collected.
 - V. Information Collected Through Technology.
As you use and interact with our Platform, we may use automatic data collection technologies to collect certain information about your devices, browsing actions and patterns, including:
- b. Information collected by our servers. To facilitate the Platform and make it as workable as possible, we (or a third-party service provider) collect information from you, including, but not limited to, your browser type, operating system, Internet Protocol ("IP") address, mobile device ID, blockchain address, wallet type and date/time stamps.
 - I. Log Files.
As is true of most websites and applications, we collect certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet Service Provider ("ISP"), referring/exit pages,

operating system, date/time stamps, and clickstream data. We use this information to analyze trends, administer the Platform, track users' movements around the Platform, and better tailor the Platform to our Users' needs. For example, some of the information may be collected so that when you visit the Platform, it will recognize you and the information can be used to personalize your experience.

II. Cookies.

Like many online services, we use cookies to collect information. We may use both session cookies (which expire once you close your Web browser) and persistent cookies (which remain on your computer until you delete them) to analyze how users interact with our service, make improvements to our product quality, and provide users with a more personalized experience.

III. Pixel tag.

In addition, we use "Pixel Tags" (also called clear Gifs, Web beacons or Web bugs). Pixel Tags allow us to analyze how users find our Platform, optimize the Platform and tailor your experience with us to your specific interests and needs.

IV. Our Platform currently recognizes "do not track" signals or other mechanisms that may allow users to opt out of tracking on our site.

V. Analytics Services.

In addition to the tracking technologies we set, such as cookies and pixel tags, other companies may set their own cookies or similar tools when you visit our Service. This includes third-party analytics services ("Analytics Services") that we engage to help analyze how users use the Platform. Information generated by the Cookies or other technologies about your use of our Platform (the "Analytics Information") is sent to the Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity, which we may receive on an individual or aggregate basis. We use the information we receive from Analytics Services to improve our Platform. The Analytics Services may also transfer information to third parties if required to do so by law, or when those third parties process Analytics information on their behalf. The ability of each Analytics Services to use and share Analytics information is limited by the terms of use and the privacy policies of such Analytics Services. By using our Platform, you consent to Analytics Services processing data about you in the manner and for the purposes set forth above.

c. Information Collected from Outside Companies.

We may receive Personal and/or Anonymous Information about you from companies that offer their products and/or services for use in conjunction with our Platform or whose products and/or services may be linked from our Platform. For example, third-party wallet providers provide us with your blockchain address and certain other information you may wish to share with those wallet providers. We may add this to the data we have already collected from or about you through our Service.

d. Public information observed on blockchains. We collect data from activity that is publicly visible and/or accessible on blockchains. This may include blockchain addresses and information about purchases, sales or transfers of NFTs, which may then be linked to other data you have provided to us.

4. Use of your Personal Data

a. Your Personal Data is processed in order to run our Platform and allow you to use it, improve and personalize your use of the Platform. In particular, we use your Personal Data to:

- I. Facilitate the creation, use and security of your account;
- II. Identify you as a User in our system;
- III. Enable you to view, explore and create Products using our tools and, if you wish, connect directly with others to buy, sell or transfer Products on public blockchains;
- IV. improve the management of our Platform and the quality of its use, including, but not limited to, analyzing the use of the Platform by you and others and your opinions about it;
- V. provide customer support and respond to your requests and questions;
- VI. investigate and address conduct that may violate our [Terms of Service](#);

- VII. detect, prevent and address fraud, violations of our terms or policies and/or other harmful or illegal activities;
 - VIII. send you a welcome email to verify ownership of the email address provided when your Account was created;
 - IX. Send you administrative notifications, such as security, support and maintenance advisories;
 - X. Send you notifications regarding actions on the Platform, including notifications of offers on your Products;
 - XI. Send you newsletters, promotional materials and other notices regarding our services or third-party goods and services;
 - XII. comply with applicable laws, cooperate with investigations by law enforcement or other authorities into suspected violations of law, and/or to pursue or defend legal threats and/or claims; and
 - XIII. Act in any other way that we may describe when you provide the Personal Data.
- b. We may create Anonymous Data records based on Personal Data. We use this Anonymous Data to analyze request and usage patterns so that we can improve our Platform. We reserve the right to use Anonymous Data for any purpose and to disclose Anonymous Data to third parties without restriction.

5. Disclosure of your personal information.

We disclose your Personal Information as described below and as described elsewhere in this Privacy Policy.

- a. External Service Providers.
We may share your Personal Data with third-party service providers to: provide technical infrastructure services; conduct quality assurance testing; analyze how unused; prevent, detect and respond to unauthorized activity; provide technical and customer support; and/or to provide other support to us and to our Platform.
- b. Affiliates.
We may share some or all of your Personal Data with subsidiaries, joint ventures or other companies under our common control ("Affiliates"), in which case we will require our Affiliates to comply with this Privacy Policy.
- c. Corporate Restructuring.
We may share some or all of your Personal Data in connection with or during negotiations of a merger, financing, acquisition or dissolution transaction or proceeding involving the sale, transfer, disposition or disclosure of all or part of our business or assets. In the event of insolvency, bankruptcy or receivership, Personal Data may also be transferred as business assets. If another company acquires our business, company or assets, that company will own the Personal Data collected by us and assume the rights and obligations with respect to your Personal Data as described in this Privacy Policy.
- d. Legal Rights.
Regardless of any choices you make regarding your Personal Data (as described below), we may disclose Personal Data if we believe in good faith that such disclosure is necessary: (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas, warrants or other legal process served on or against us; (c) to protect or defend the rights or property of Users of our Platform; and/or (d) to investigate or help prevent a violation or potential violation of law, this Privacy Policy or our Terms of Service.
- e. Other Disclosures.
We may also disclose your Personal Information: to accomplish the purpose for which you provide it; for any other purpose disclosed by us when you provide it; or with your consent.

6. Third-party websites.

Our Platform may contain links to third-party websites. When you click on a link to another website or location, you leave our Platform and go to another site and another entity may collect Personal Data from you. We do not control, do not review and cannot be responsible for these third-party websites or their content. Please note that the terms of this Privacy Policy do not apply to third-party websites or their content, or to the collection of your

Personal Data after you click on links to such third-party websites. We encourage you to read the privacy policy of each website you visit. Any links to third-party websites or sites are for your convenience and do not constitute our endorsement of such third parties or their products, content or websites.

7. Third-party wallets.

To use our Platform, you must use third-party Wallets that allow you to conduct transactions on public blockchains. Your interactions with a third-party Wallet provider is governed by that third party's applicable terms and conditions and privacy policy.

8. Your choices regarding information.

You have several choices regarding the use of information on our Platform:

- a. Email Communications.
We may periodically send you newsletters and/or emails that directly promote the use of our Platform or third-party products/services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving these communications from us by following the unsubscribe instructions in the email you receive or through the notification preferences on your Settings page .
- b. If at any time you decide that you no longer wish to accept cookies from our Platform for any of the purposes described above, you may instruct your browser, by changing its settings, to stop accepting cookies or ask you before accepting a cookie from the websites you visit. Please refer to your browser's technical information. However, if you do not accept cookies, you may not be able to use all parts of the Service or all functionality of the Service.

9. Data access and management.

You can view, access, edit or delete your Personal Information for certain aspects of our Platform through your Settings page . You may also have certain additional rights:

- a. If you are a user in the European Economic Area or the United Kingdom, you have certain rights under the respective European and UK General Data Protection Regulation ("AVG"). These include the right to (i) request access and obtain a copy of your personal data; (ii) request rectification or erasure; (iii) object to or restrict the processing of your personal data; and (iv) request portability of your personal data. In addition, if we have collected and processed your personal data with your consent, you have the right to withdraw your consent at any time.
- b. If you are a California resident, you have certain rights under the California Consumer Privacy Act ("CCPA"). These include the right to (i) request access to, details of, and a copy of the personal information we have collected about you and/or shared with third parties; (ii) request deletion of the personal information we have collected about you; and (iii) the right to opt out of the sale of your personal information. As the terms are defined under the CCPA, we do not "sell" your "personal information."
- c. If you wish to exercise your rights under the AVG, CCPA or other applicable data protection or privacy laws, please contact us at support@colecti.com, specify your request and refer to the applicable law. We may ask you to verify your identity or request further information about your request. We will consider each request above and act on it in accordance with applicable law. We will not discriminate against you for exercising any of these rights.
- d. Notwithstanding the above, we cannot edit or delete information stored on a blockchain because we have no custody or control over blockchains. Information stored on the blockchain may include purchases, sales and transfers related to your blockchain address and Products held at that address.

10. Retention of data.

We may retain your Personal Data as long as you continue to use our Platform, have an account with us, or as long as necessary to accomplish the purposes described in this Privacy Policy. We may continue to retain your Personal Data even after you deactivate your Account and/or stop using the Service if such retention is reasonably necessary to comply with our legal obligations, resolve disputes, prevent fraud and abuse, enforce our Terms or other agreements, and/or protect our legitimate interests. When your Personal Data is no longer needed for these purposes, we will delete it.

11. Data Protection.

We care about the security of your information and use physical, administrative and technological safeguards to maintain the integrity and security of information collected through our Platform. However, no security system is impenetrable and we cannot guarantee the security of our systems. In the event that information under our care and control is compromised due to a security breach, we will take steps to investigate and remedy the situation and, in accordance with applicable laws and regulations, notify those individuals whose information may have been compromised. You are responsible for the security of your Wallet and we encourage you to take steps to ensure that it is and remains secure. If you discover a problem related to your Wallet, please contact your Wallet provider.

12. Minors.

We do not intentionally collect Personal Data from visitors under the age of 13. Our [Terms and Conditions](#) require all users to be at least 18 years old. If a child under 18 submits Personal Data to us and we learn that the Personal Data is the information of a child under 18, we will attempt to delete the information as soon as possible. If you believe that we may have Personal Data of a child under 18, please contact us at support@colecti.com.

13. Users outside the United States.

If you are a non-U.S. User of our Platform and thereby provide data to us, you acknowledge and agree that your Personal Data may be processed for the purposes specified in the Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding the processing of Personal Data may not be as strict as the laws in your country. By providing your Personal Data, you consent to any such transfer.

14. Changes to this privacy policy.

This Privacy Policy may be modified from time to time for any reason. We will notify you of any changes to our Privacy Policy by sharing the new Privacy Policy on our Platform. The date the Privacy Policy was last revised will be noted at the beginning of this Privacy Policy. It is your responsibility to be aware of the applicable terms and policies. It is your responsibility to accomplish this by periodically visiting our [Terms and Conditions](#) and this Privacy Policy to check for any changes.

15. Questions; Contacting; Reporting violations.

If you have any questions, concerns or complaints about our Privacy Policy or data collection or processing policies, or if you wish to report security violations to us, please contact us at support@colecti.com.